

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

MELVIN ROBERT MOSLEY,

Case: 4:23-cr-20605

Judge: Behm, F. Kay

MJ: Ivy, Curtis

Filed: 10-25-2023 At 04:38 PM

INDI USA v. Melvin Mosley (krc)

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

**Distribution of Fentanyl
(21 U.S.C. § 841(a)(1))**

On or about September 27, 2023, in the Eastern District of Michigan, Melvin Robert Mosley knowingly and intentionally distributed a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT TWO
Distribution of Fentanyl
(21 U.S.C. § 841(a)(1))

On or about October 16, 2023, in the Eastern District of Michigan, Melvin Robert Mosley knowingly and intentionally distributed a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

COUNT THREE
Possession with Intent to Distribute Cocaine
(21 U.S.C. § 841(a)(1))

On or about October 16, 2023, in the Eastern District of Michigan, Melvin Robert Mosley knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby gives notice to the defendant of its intention to seek forfeiture of all proceeds of the alleged violations, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; all

property involved in, or property traceable to, the violations alleged in this Indictment.

Dated: October 25, 2023

DAWN N. ISON
United States Attorney

s/Anthony P. Vance
ANTHONY P. VANCE
Assistant United States Attorney
Chief, Branch Offices

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

s/William Orr for
TIMOTHY M. TURKELSON
Assistant United States Attorney
600 Church Street, Suite 210
Flint, MI 48502
Telephone number: (810) 766-5177
Timothy.turkelson@usdoj.gov

Companion Case information MUST be completed by AUSA and initialed.

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Case: 4:23-cr-20605 Judge: Behm, F. Kay MJ: Ivy, Curtis Filed: 10-25-2023 At 04:38 PM INDI USA v. Melvin Mosley (krc)
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Case Title: USA v. Melvin Robert MosleyCounty where offense occurred : GeneseeCheck One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 23-mj-30416]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

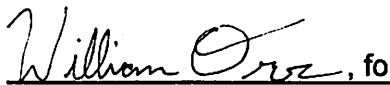
- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 25, 2023

 Date


 _____, for
 Timothy Turkelson
 Assistant United States Attorney
 210 Federal Building
 600 Church Street
 Flint, Michigan 48502
 Telephone: (810) 766-5177
 Email: Timothy.Turkelson@usdoj.gov
 P53748

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.